

EXHIBIT A

Erik Babcock

From: Sprague, Doug (USACAN) <Doug.Sprague@usdoj.gov>
Sent: Thursday, August 14, 2014 4:52 PM
To: Erik Babcock
Subject: RE: briefing schedule
Attachments: brugnara-natalia-302.pdf

Another copy of first one attached. I thought I provided it, along with explanation that you (and your client and Mr. Kane) know the redacted info – i.e., her last name, phone number, and address. In any event, it's attached here.

From: Erik Babcock [<mailto:erik@babcocklawoffice.com>]
Sent: Thursday, August 14, 2014 4:34 PM
To: Sprague, Doug (USACAN)
Subject: RE: briefing schedule

Where is the first one? The last time I asked you said the agent was still finalizing the 302

From: Sprague, Doug (USACAN) [<mailto:Doug.Sprague@usdoj.gov>]
Sent: Thursday, August 14, 2014 3:56 PM
To: Erik Babcock
Subject: RE: briefing schedule

You have the first one (of two). Attached is the second one (of two).

From: Erik Babcock [<mailto:erik@babcocklawoffice.com>]
Sent: Thursday, August 14, 2014 2:33 PM
To: Sprague, Doug (USACAN)
Cc: Erik Babcock Owner
Subject: RE: briefing schedule

Also, can I get any 302s for Natalya please.

From: Sprague, Doug (USACAN) [<mailto:Doug.Sprague@usdoj.gov>]
Sent: Thursday, August 14, 2014 1:59 PM
To: Erik Babcock <erik@babcocklawoffice.com> (erik@babcocklawoffice.com)
Subject: briefing schedule

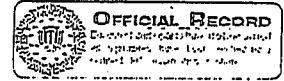
Erik –

When can you file a response to the advice of counsel issue? With the hearing set for 9/3, how about you file on Monday or Tuesday (8/25 or 8/26), the G files a reply, if any, 3 days later -- by 8/28 or 8/29?

Also, I'm reworking the stip re: the Rule 15 deposition a bit in light of the changed dates and to make sure we have security issues covered (secured space where the USMS can be, etc.). I will send you a revised draft later today or tomorrow.

Doug

EXHIBIT B



FEDERAL BUREAU OF INVESTIGATION

Date of entry 10/01/2014

NATALIA SHLYAPINA, telephone number [REDACTED] residence address [REDACTED], was interviewed at the United States Attorney's Office, 450 Golden Gate Avenue, 11th Floor, San Francisco, California. SHLYAPINA's attorney, DEAN PAIK, telephone number (415) 956-2828, business address 311 California Street, San Francisco, California, was present during the interview. Assistant United States Attorneys Doug Sprague and Benjamin Kingsley, United States Attorney's Office, Northern District of California, also participated in the interview. After being advised of the identity of the interviewing agent, SHLYAPINA provided the following information:

SHLYAPINA first spoke with LUKE BRUGNARA in approximately late July 2013 when he introduced himself to her in the Las Vegas airport. In that first conversation, BRUGNARA asked SHLYAPINA if she had ever heard of him. Almost right away, BRUGNARA also asked SHLYAPINA to "google" him.

SHLYAPINA did not speak with BRUGNARA on the plane from Las Vegas to San Francisco, but BRUGNARA was waiting for SHLYAPINA when the plane landed in San Francisco and BRUGNARA offered to give SHLYAPINA a ride home.

SHLYAPINA declined BRUGNARA's offer but gave BRUGNARA her telephone number. The next time SHLYAPINA spoke with BRUGNARA was a few days later when BRUGNARA called SHLYAPINA to ask her out. The next time SHLYAPINA saw BRUGNARA was approximately a week or two later when SHLYAPINA and BRUGNARA went to the De Young Museum in San Francisco. On that day, BRUGNARA told SHLYAPINA he collected art and was fond of "old masters". He also told SHLYAPINA he had been in prison for tax related issues.

SHLYAPINA's relationship with BRUGNARA developed into a romantic relationship. There is no chance someone other than BRUGNARA is the father of SHLYAPINA's child. SHLYAPINA read on the Internet that if a man and

Investigation on 08/26/2014 at San Francisco, California, United States (In Person)

File # 196D-SF-4846231

Date drafted 09/04/2014

by HADLEY ELIZABETH J

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woman are not married, a woman cannot put the name of the father on the child's birth certificate without his consent and signature. Therefore SHLYAPINA did not include BRUGNARA's name as the father on her child's birth certificate.

SHLYAPINA had a romantic relationship with BRUGNARA from approximately August 2013 to May 2014. Towards the beginning of that relationship, BRUGNARA told SHLYAPINA he was going to divorce his wife. BRUGNARA also told SHLYAPINA he was going to move to Las Vegas for business. Eventually BRUGNARA told SHLYAPINA divorcing his wife would be complicated because of money and his children. BRUGNARA did not speak much about divorcing his wife later in their relationship.

When SHLYAPINA told BRUGNARA she was pregnant, BRUGNARA was happy and told SHLYAPINA he wanted her to keep the baby. Based on what BRUGNARA said, SHLYAPINA thought they were going to be together as a couple with the baby.

BRUGNARA told SHLYAPINA he was on probation and had tax debt. BRUGNARA told SHLYAPINA he was going to resolve his financial and legal issues by refinancing and going back into business. BRUGNARA told SHLYAPINA he had no money. BRUGNARA volunteered all of this information to SHLYAPINA.

Before SHLYAPINA became pregnant, she went on dates with BRUGNARA approximately one or two times per week. As time went on, the dates became more rare and by February 2014 they were only seeing each other once a month. In March and April 2014, BRUGNARA and SHLYAPINA were still dating, but not often.

When BRUGNARA paid for things on their dates, he almost always paid with cash. BRUGNARA never used a credit card and only once did SHLYAPINA see him use a check. BRUGNARA said the check was from his wife's account and he used it to pay for the storage facility in Gilroy, California.

In August or September 2013, BRUGNARA and SHLYAPINA went to a hotel in

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Half Moon Bay on several occasions. SHLYAPINA does not remember the name of the hotel but it was not the Ritz Carlton. They ate dinner at the hotel but did not stay overnight there.

SHLYAPINA has been to BRUGNARA's residence on Sea Cliff in San Francisco approximately five times. The first time was before November 2013 and the last time was in January or February 2014. BRUGNARA told SHLYAPINA the house was his and he needed to pay the mortgage on it.

BRUGNARA indicated there were financial issues with the house. The house was in terrible condition inside. BRUGNARA told SHLYAPINA there had been searches by law enforcement there and the wife did not want to clean up after the searches. BRUGNARA showed SHLYAPINA a painting in his house of a blonde woman wading.

BRUGNARA told SHLYAPINA he was currently unemployed, but in the past he owned buildings in downtown San Francisco, including one at the intersection of Sansome Street and California Street.

BRUGNARA told SHLYAPINA that a woman from New York had contacted him and wanted to send him pieces of art by artists including Degas, de Kooning and several more. BRUGNARA told SHLYAPINA he had done business with the woman before and she wanted to send BRUGNARA the art for the museum he was planning to open in Las Vegas. BRUGNARA did not tell SHLYAPINA whether the art was a gift or a purchase from the woman. BRUGNARA told SHLYAPINA he wanted to have free admission to the museum for mothers and their children.

In March 2014, approximately one month after the conversation about the woman sending him art, BRUGNARA stopped by SHLYAPINA's apartment to bring her food. At that time, BRUGNARA told SHLYAPINA he had to go home because the woman had arrived with the art and he needed to put the art in his garage. Later that same day, BRUGNARA told SHLYAPINA the art had indeed arrived. BRUGNARA did not mention that any art was missing or that anything unexpected had happened with regard to the art.

Sometime after receiving the art, BRUGNARA told SHLYAPINA he had

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discovered information on the Internet about the woman who had sent the art. BRUGNARA told SHLYAPINA she was part of a scam and she wanted to take the art back, but BRUGNARA was not going to give it to her because he did not trust her and she might allege something is missing. BRUGNARA told SHLYAPINA he had asked the woman to contact his attorney.

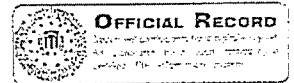
Sometime before May 2014, BRUGNARA told SHLYAPINA a story about a Russian man who lived in the early 20th century and had discovered molds of Degas sculptures. BRUGNARA told SHLYAPINA the man had produced some sculptures from the molds but the Degas Foundation did not accept them as originals. BRUGNARA gave SHLYAPINA a book partially written in Russian and asked her to read it and provide him with the information it contained.

On the telephone prior to meeting BRANDON LEBLANC, LEBLANC asked SHLYAPINA if she knew of a place BRUGNARA would hide something or anyone else who would know such a place. SHLYAPINA told LEBLANC about the containers in Gilroy and that BRUGNARA's wife might know something. When SHLYAPINA arrived at LEBLANC's office for a meeting he had scheduled, LEBLANC canceled the meeting because he was no longer representing BRUGNARA.

On 08/22/2014, BRUGNARA offered SHLYAPINA the use of his own attorney. BRUGNARA told SHLYAPINA to tell the truth. SHLYAPINA told BRUGNARA she did not want to discuss the case or attorneys.

BRUGNARA believed SHLYAPINA was not allowed to apply for an H1B visa with a company. SHLYAPINA applied for an H1B visa in March 2014 to be able to work in October 2014 but she was denied. SHLYAPINA believes everything on her visa applications, to include her tourist visa, F1 visa, and H1B visa, is true and accurate.

EXHIBIT C



FEDERAL BUREAU OF INVESTIGATION

Date of entry 08/13/2014

NATALIA S [REDACTED] telephone number (415) [REDACTED], residence address [REDACTED] Avenue, [REDACTED] California, was interviewed at her residence. After being advised of the identity of the interviewing agents, S [REDACTED] provided the following information:

S [REDACTED] gave birth to LUKE BRUGNARA's son in late July 2014. She has applied for the baby's Russian passport and expects to receive it in late August or early September, at which point she plans to move to Moscow, Russia. S [REDACTED]'s "optional program training" Visa expires on 08/31/2014. S [REDACTED] listed herself as the only parent on the baby's birth certificate. S [REDACTED] has no income in the United States and is currently looking for a job in Moscow.

BRUGNARA called S [REDACTED] at the beginning of August 2014. When BRUGNARA asked S [REDACTED] if she was "still on board with the plan", S [REDACTED] believes he was referring to the plan of him getting a divorce and being with her, which they had talked about before he was arrested.

S [REDACTED] stated she has her own plan now, which includes moving to Russia with her baby when her Visa expires. S [REDACTED] stated she is a person who sticks to the rules.

S [REDACTED] stated she has not spoken to BOB KANE since he called her several times in May 2014. KANE called S [REDACTED] to tell her BRUGNARA had been arrested and then called her several additional times to provide her with updates on BRUGNARA's case.

S [REDACTED] has met BRANDON LEBLANC once.

Investigation on 08/11/2014 at San Francisco, California, United States (In Person)File # 196D-SF-4846231Date drafted 08/11/2014by DESOR JEREMY S, HADLEY ELIZABETH J

Erik Babcock

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Sent: Thursday, August 14, 2014 3:56 PM
To: Erik Babcock
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Subject: briefing schedule

Erik –

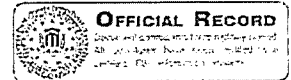
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Doug



This email is free from viruses and malware because avast! Antivirus protection is active.



FEDERAL BUREAU OF INVESTIGATION

Date of entry 07/29/2014

NATALIA S [REDACTED] telephone number (415) [REDACTED] residence address [REDACTED] Avenue, San Francisco, California, was interviewed at her residence. After being advised of the identity of the interviewing agents, S [REDACTED] provided the following information:

S [REDACTED] met LUKE BRUGNARA approximately one year ago on a flight back from Las Vegas, Nevada and has been in contact with him since. S [REDACTED] is nine months pregnant with BRUGNARA's baby.

Much of what S [REDACTED] knows about BRUGNARA she learned on the Internet. S [REDACTED] learned through Wikipedia that BRUGNARA had legal problems with his taxes and was interested in fine art. S [REDACTED] also learned BRUGNARA was on probation until October 2014.

BRUGNARA told S [REDACTED] he did not have a job. BRUGNARA sat at home much of the time. Before he was arrested, S [REDACTED] had been seeing BRUGNARA three or four times a week. BRUGNARA and S [REDACTED] would often hang out at S [REDACTED]'s apartment. S [REDACTED] has only been to BRUGNARA's house once. BRUGNARA took her there to see the view from the house. The house was mostly empty, but S [REDACTED] saw at least two wooden crates in the garage.

BRUGNARA told S [REDACTED] he bought art when he was working in real estate. BRUGNARA told S [REDACTED] he has a couple of paintings but they are not certified.

BRUGNARA never asked S [REDACTED] for help or disclosed any information to her with regard to pieces of art. S [REDACTED] has already been interviewed

Investigation on 07/17/2014 at San Francisco, California, United States (In Person)File # 196D-SF-4846231Date drafted 07/17/2014by HADLEY ELIZABETH J, DESOR JEREMY S

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by BRUGNARA's attorneys, who told S [REDACTED] the case against BRUGNARA is based on a misunderstanding.

BRUGNARA did not have friends and the people he was most in contact with were S [REDACTED] his mom, his brother who lived with his mom, and MARK LEVINSON.

In approximately March 2014, BRUGNARA took S [REDACTED] to a storage facility in Gilroy, California. BRUGNARA told S [REDACTED] he wanted to go there because he had not been in several years. BRUGNARA opened one of his three storage containers and it contained casino items. There was no lock on the container that BRUGNARA opened. BRUGNARA could not open the other two containers because they were locked and BRUGNARA did not have the keys. S [REDACTED] does not believe BRUGNARA would store anything valuable in the containers.

In approximately March or April 2014, BRUGNARA told S [REDACTED] a lady was going to send him a Degas statue for his museum. BRUGNARA had told S [REDACTED] he wanted to open a museum in Las Vegas and was negotiating with the Riviera and other places. BRUGNARA never mentioned anything about the lady sending him paintings as well. BRUGNARA told S [REDACTED] a story about Degas and a foundry and gave S [REDACTED] a book about Degas written in Russian to educate herself. S [REDACTED] stated she was willing to give the book to the interviewing agents. The original FD-597, Receipt for Property, for the book will be maintained in the 1A section of the file.

BRUGNARA has called S [REDACTED] twice since he has been in jail. BRUGNARA did not tell S [REDACTED] why he was in jail because he said the calls were being recorded.